

SYMETRA LIFE INSURANCE COMPANY,

Plaintiff,

v.

JJK 2016 INSURANCE TRUST,

Defendant.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Civil Action No.: 18-cv-12350 (MAS)(DEA)

**AMENDED PRETRIAL
SCHEDULING ORDER**

THIS MATTER having come before the Court for an initial scheduling conference pursuant to Rule 16 of the Federal Rules of Civil Procedure on November 27, 2018; the parties having agreed to a 90 day extension of all deadlines; the Court having conferred with counsel concerning the timely completion of discovery; and good cause appearing for the entry of this Order:

IT IS on this 5th **day of June, 2019**

ORDERED THAT:

I. DISCOVERY

1. All fact discovery, including any third party depositions, is to be complete by **September 3, 2019**. No fact discovery is to be issued or conducted after this date, except that discovery requests issued before this date, the response time for which extends beyond this date, will be responded to within the time provided by the Rules of Civil Procedure or as agreed between counsel.
2. Any party intending to file a dispositive motion must first seek leave of the Court by way of a letter application. All calendar or dispositive motions, if permitted, shall comply with L.Civ.R. 7.1(b) and 78.1.
3. Counsel must meet and confer in a good faith effort to resolve any discovery or case management dispute before bringing such dispute to the attention of the Court. See L.Civ.R. 16.1(f)(1). Any unresolved disputes must be brought to the Court's attention promptly by a joint letter to the undersigned.

4. No discovery motion or motion for sanctions for failure to provide discovery shall be made without prior leave of Court.

II. EXPERTS

5. All affirmative expert's disclosures and reports (liability and damages) must be served by **September 27, 2019**. All such reports must be in the form and content required by Fed.R.Civ.P. 26(a)(2)(B).
6. All responsive expert's disclosures and reports must be served by **October 30, 2019**. All such reports shall be in the form and content as described above.
7. No expert shall testify at trial as to any opinions or base those opinions on fact not substantially disclosed in his or her report.

III. FUTURE CONFERENCES

8. The Court will conduct ^a telephone status conferences on Sept 4th 2019 at 3:30pm AM/PM; and on _____ at _____ AM/PM. Counsel for Plaintiff is directed to initiate the calls to (609) 989-2144.
9. Counsel must confer at least 48 hours in advance of each Court appearance to confirm attendance and to review any matters to be discussed with the Court.
10. The Court may from time to time schedule conferences as may be required, either sua sponte or at the request of a party. Failure to appear at such conferences, or to comply with the terms of this or any Court Order, may result in the imposition of sanctions.
11. Counsel should be prepared to discuss settlement at every conference with the Court. Lead trial counsel and client(s) with full settlement authority are required to appear in-person at any settlement conference conducted by the Court. In cases involving insurance companies and other corporate or business entities, it is expected that the executive who will make the final decision regarding settlement will be the person available for the conference.

12. Since all dates set forth herein are established with the assistance and knowledge of counsel, there will be no extensions except for good cause shown and by leave of the Court, even with consent of all counsel.



HON. DOUGLAS E. ARPERT
United States Magistrate Judge